

1 WRIGHT, FINLAY & ZAK, LLP
2 Christina V. Miller, Esq.
3 Nevada Bar No. 12448
4 Krista J. Nielson, Esq.
5 Nevada Bar No. 10698
6 7785 W. Sahara Ave., Suite 200
7 Las Vegas, NV 89117
8 (702) 475-7964; Fax: (702) 946-1345
9 cmiller@wrightlegal.net
10 knielson@wrightlegal.net

11 *Attorneys for Plaintiff/Counter-Defendant, PROF-2013-S3 Legal Title Trust IV, by U.S. Bank*
12 *National Association, as Legal Title Trustee*

13 **UNITED STATES DISTRICT COURT**
14 **DISTRICT OF NEVADA**

15 PROF-2013-S3 LEGAL TITLE TRUST IV, BY
16 U.S. BANK NATIONAL ASSOCIATION, AS
17 LEGAL TITLE TRUSTEE,

18 Plaintiff,

19 vs.

20 REO INVESTMENT ADVISORS V, LLC,
21 RICHARD BARON, MANAGER; EL
22 DORADO NEIGHBORHOOD SECOND
23 HOMEOWNERS ASSOCIATION,

24 Defendants.

25 REO INVESTMENT ADVISORS V, LLC,

26 Counterclaimant,

27 vs.

28 PROF-2013-S3 LEGAL TITLE TRUST IV, BY
U.S. BANK NATIONAL ASSOCIATION, AS
LEGAL TITLE TRUSTEE,

Counter-Defendant.

Case No.: 2:17-cv-00277-JCM-CWH

**STIPULATION AND ORDER TO
EXTEND DISPOSITIVE MOTION
DEADLINE**

[FIRST REQUEST]

///

///

1 **STIPULATION AND ORDER TO EXTEND DISPOSITIVE MOTION DEADLINE**

2 Plaintiff/Counter-Defendant, PROF-2013-S3 Legal Title Trust IV, by U.S. Bank
3 National Association, as Legal Title Trustee (hereinafter “PROF”), Defendant/Counterclaimant,
4 REO Investment Advisors V, LLC (hereinafter “REO”), and Defendant, El Dorado
5 Neighborhood Second Homeowners Association (“HOA”) (collectively, the “Parties”), by and
6 through their respective counsels of record, hereby stipulate as follows:

7 PROF originally attempted to depose the 30(b)(6) witness for REO prior to the close of
8 discovery, however, the parties have encountered difficulties completing the deposition. The
9 deposition of the designated witness for REO is currently scheduled for March 9, 2018, while
10 dispositive motions are currently due by March 30, 2018. The parties are requesting an
11 extension of the dispositive motion deadline so that the parties have additional time to fully
12 brief the Court in this matter.

13 LR 26-4 requires a stipulation to extend a deadline to be made no later than 21 days
14 before the subject deadline and if made within 21 days of the deadline, it must be supported by a
15 showing of good cause. This stipulation is within 21 days of the discovery deadline (March 30,
16 2018).

17 IT IS HEREBY STIPULATED AND AGREED that the Parties shall have an extension
18 of thirty (30) days, up to and until April 30, 2018, to file their respective Motions for Summary
19 Judgment.

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

1 This is the parties' first request for extension of the dispositive motions deadline. This
2 request is not intended to cause any delay or prejudice to any party.

3
4 IT IS SO STIPULATED.

5 DATED this 7th day of March, 2018.

DATED this 7th day of March, 2018.

6 WRIGHT, FINLAY & ZAK, LLP

LEACH JOHNSON SONG & GRUCHOW

7 /s/ Krista J. Nielson

/s/ Ryan D. Hastings

8 Christina V. Miller, Esq.
9 Nevada Bar No. 12448
10 Krista J. Nielson, Esq.
11 Nevada Bar No. 10698
12 7785 W. Sahara Ave., Suite 200
13 Las Vegas, NV 89117
14 *Attorneys for Plaintiff/Counter-Defendant, PROF-*
15 *2013-S3 Legal Title Trust IV, by U.S. Bank*
16 *National Association, as Legal Title Trustee*

Sean L. Anderson, Esq.
Nevada Bar No. 7259
Ryan D. Hastings, Esq.
Nevada Bar No. 12394
8945 West Russell Road, Suite 330
Las Vegas, Nevada 89148
Attorneys for Defendant, Eldorado
Neighborhood Homeowners' Association

17 DATED this 7th day of March, 2018.

18 HONG & HONG

19 /s/ Joseph Y. Hong

20 Joseph Y. Hong, Esq.
21 Nevada Bar No. 05995
22 10781 West Twain Avenue
23 Las Vegas, NV 89135
24 *Attorneys for Defendant/Counterclaimant, REO*
25 *Investment Advisors V, LLC*

26
27 IT IS SO ORDERED.

28 DATED this _ March 9 _____, 2018.


UNITED STATES MAGISTRATE JUDGE